

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

JUANITA GARCIA, individually and on behalf
of all others similarly situated,

Plaintiff,

v.

NATIONSTAR MORTGAGE LLC, a Delaware
limited liability company,

Defendant.

NO. C15-1808 TSZ

STIPULATION AND [PROPOSED]
ORDER AMENDING MINUTE ORDER
SETTING TRIAL AND RELATED DATES

NOTE ON MOTION CALENDAR:
September 29, 2016

WHEREAS, the current deadline for completion of discovery on class certification issues is September 30, 2016;

WHEREAS, any motions related to class certification must be filed by October 21, 2016;

WHEREAS, the parties had conferred and scheduled FRCP 30(b)(6) depositions of Defendant's representatives for September 14, 2016 and September 15, 2016;

WHEREAS, due to a death in the family of the Plaintiff's attorney who had prepared for and was scheduled to take those depositions, the parties had to postpone them, along with an in-person meet and confer regarding discovery issues that was to take place after the depositions;

WHEREAS, the parties subsequently attempted to identify additional dates for depositions of those witnesses;

1 WHEREAS, before dates could be finalized, and before the parties could complete their
2 meet and confer regarding their discovery dispute, Defendant's lead counsel had a family
3 medical emergency that required interstate travel;

4 WHEREAS, the parties have been unable to complete their meet and confer efforts prior
5 to the September 30, 2016 class discovery cutoff, and the parties have not yet been able to
6 confirm scheduling for the FRCP 30(b)(6) depositions;

7 WHEREAS, the parties require a 30-day extension of the class discovery cutoff and the
8 class certification deadline to schedule and take the FRCP 30(b)(6) depositions and complete
9 other discovery and investigation related to class certification; and

10 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
11 counsel of record, and subject to the Court's approval, as follows:

12 1. The deadline for completing discovery on class certification issues is October 31,
13 2016;

14 2. The deadline to file any motions related to class certification is November 21,
15 2016;

16 IT IS SO STIPULATED.

17 s/ Cliff Cantor

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7 Counsel for Plaintiff

8
9 [Proposed] **ORDER**

10 Pursuant to stipulation, IT IS SO ORDERED.

11 DATED: September 29 ____, 2016

12
13
14 _____
15 THE HONORABLE THOMAS S. ZILLY
16 UNITED STATES DISTRICT JUDGE

17 Presented by:

Cliff Cantor, WSBA # 17893

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21 Certificate of Service

22 I certify that, on the date stamped above, I caused this document to be filed with the Clerk
23 of the Court using the CM/ECF system, which will email notice of filing to all counsel of record.

24 s/ Cliff Cantor, WSBA # 17893